

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Jason Goodman,
D/B/A CrowdSource The Truth

Plaintiff,

CASE: 1: 21-cv-10878-AT-JLC

-against-

JUDGE TORRES

George Webb Sweigert,

Defendant.

Pro Se Intervenor
D. G. SWEIGERT, C/O
MAILBOX, PMB 13339
514 Americas Way, Box
Elder, SD 57719
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503-919-0748
Georg.webb@gmail.com

OPPOSITION TO PLAINTIFF JASON GOODMAN'S DOCUMENT ECF No. 33.
(VOLUME OF EXHIBITS UNDER SEPARATE FILING)

I hereby attest that the foregoing was transmitted on June 14, 2022 (6/14/2022) under the penalties of perjury.



PROPOSED INTERVENOR
D. G. SWEIGERT, C/O
MAILBOX, PMB 13339
514 Americas Way,
Box Elder, SD 57719

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OPPOSITION TO ECF No. 33.

INTRODUCTION

The undersigned *pro se* non-attorney third-party, comes to oppose Plaintiff's objections to limited permissive intervention pursuant to Fed. Rules Civ. Proc. (F.R.C.P.) Rule 24(b). The undersigned Movant is the estranged brother of Defendant George Webb Sweigert, aka "GEORGE WEBB" in social media podcast circles.

Plaintiff Jason Goodman (1) files court documents for the purposes of providing content to social media podcasts, and (2) files lawsuits (like this instant action) to create social media content. Mr. Goodman fabricates situations that involve "criminal conduct" so that he may continually broadcast the pending "criminal investigation" against the Sweigert brothers. This is a "criminal" social media narrative that Mr. Goodman uses to raise monies from his donation website (COUNTERLAWFARE) and his paid subscribers on pay-per-view services.

For "GEORGE WEBB" and Plaintiff Jason Goodman creating hoax and sham news dates back five years when both were appearing as "investigation partners" in joint podcasts and Livestreams in the Spring of 2017. Featured stories included (1) Hillary Rodman Clinton's e-mail messages and laptop and (2) the Wikileaks hacked leaks and drops of John Podesta's e-mail messages while he was Chairman of Hillary Clinton's campaign, etc.

Then a "dirty bomb hoax" occurred at the Port of Charleston, South Carolina on June 14, 2017 as a result of Plaintiff Goodman's and Defendant G. W. Sweigert's clever manipulation of the audience of 2,000 live streamed viewers. A full-scale radiological device response occurred shortly after 2,000 Goodman/Webb viewers tweeted "MEMPHIS MEARSK ... DIRTY BOMB PLEASE INVESTIGATE" simultaneously to the attention of the 7th U.S. Coast Guard

District Incident Command Center in Miami, Florida. The response included evacuation of the Port, deployments of nuclear equipment from the National Guard, Fire and Hazard Material rescue, State Police, etc. Proposed intervenor D.G. Sweigert became aware of Jason Goodman and his brother's social media activities at that time.

Following the “dirty bomb hoax”, both GEORGE WEBB and Plaintiff Goodman were featured in at least a dozen major news outlets, to include the New York Times, Cable News Network (C.N.N.), Associated press, Journal-Gazette, SPUTNIK, etc.

<https://www.amazon.com/Report-Charleston-Dirty-So...>

Report: The Port of Charleston Dirty Bomb Hoax and Social ...

The next generation of cyber attack tools will be based upon Artificial Intelligence and can execute complex social media attacks. Law enforcement is falling ...

[https://money.cnn.com/2017/06/16/media/port-of...](https://money.cnn.com/2017/06/16/media/port-of-...)

How a conspiracy theory closed part of a major US seaport

Jun 16, 2017 — The theory: a cargo ship with a “dirty bomb” was just outside of Charleston, South Carolina. The notion came to life during a live YouTube ...

<https://www.postandcourier.com/news/conspiracy-theo...>

Conspiracy theorist who posted videos about a 'dirty bomb ...

Jun 16, 2017 — In a video posted Friday afternoon, George Webb Sweigert said he wasn't the first person to alert authorities in South Carolina about the threat ...

Google inquiry for “dirty bomb hoax”

Over the years GEORGE WEBB became more popular than Goodman (rising to a Twitter account of 60,000 subscribers). Two years ago, GEORGE WEBB was featured on the C.B.S. “60 Minutes” show and by C.N.N. Because of the second C.N.N. article GEORGE WEBB brought a garden variety defamation lawsuit in the Eastern District of Michigan against C.N.N. on Halloween 2020.

Mr. Goodman's initial complaint in this action (1:21-cv-10878) references docket no. 20, the *Goodman Amicus* filed in *Sweigert vs. C.N.N.*, as the primary reason GEORGE WEBB conspired with Defendant Christopher Bouzy to defame Mr. Goodman.

The *Goodman Amicus* (docket 20, 2:20-cv-12933-GAD-KGA, *Sweigert v. CNN*, (Eastern District of Michigan)) alleged a criminal fraud upon the court conspiracy perpetrated by Court employee (*pro se* advocate) Richard Loury, GEORGE WEBB and the undersigned. The proposed intervenor D.G. Sweigert filed a document countering the claims of the *Goodman Amicus* (see ECF 22 below).

07/20/2021	<u>20</u>	[STRICKEN] AMICUS CURIAE BRIEF by Jason Goodman (DPer) Modified on 3/21/2022 (TMcg). (Entered: 07/20/2021)
07/27/2021	<u>22</u>	DECLARATION by D.G. Sweigert filed by D.G. Sweigert. (JOwe) (Entered: 07/27/2021)

Outraged at the allegations posited in the *Goodman Amicus* (ECF no. 20 in *Sweigert v. C.N.N.*) George Webb Sweigert filed a garden variety defamation action against Jason Goodman in January 2022 in the Eastern District of Michigan. Following a change of venue, that action now rests in the S.D.N.Y. See *George Webb Sweigert v. Jason Goodman*, 1:22-cv-02788-LGS, Lorna G. Schofield, presiding.

Summary of proposed intervenor's status:

The intervention is timely as service of process is still an on-going question in the infancy of this action. Proposed-Intervenor submits this opposition in a timely manner and asserts a common question of law or fact, which does not prejudice the original party. Rule 24(b) grants the district

court discretionary power to permit intervention if the motion is timely, *NAACP v. New York*, 413 U.S. 345, 365-66, 93 S.Ct. 2591, 2602-03, 37 L.Ed.2d 648 (1973).

The proposed intervenor has a protectable interest in his professional, technical business reputation as a computer security expert that must not be involved in the civil conspiracies, as alleged by Plaintiff, for professional and ethical considerations.

The proposed intervenor presents common questions of fact and law. Plainly the Plaintiff considers Defendant George Webb Sweigert and proposed intervenor D.G. Sweigert as inextricably intertwined in a conspiracy to damage Mr. Goodman occurring for at least the previous 3.5 years (to the date of May 2018 when Defendant G. W. (Webb) Sweigert allegedly made social media comments about Plaintiff Goodman having sexual intercourse with persons barely older than 18 years of age) para. 14, Initial Complaint, ECF no. 1.

BACKGROUND

1. Plaintiff is a former Hollywood-based 3D special effects experts that was displaced by an economic downturn and decided to move back to New York City and try his hand at an “internet investigative journalist show.” Since the show’s beginnings in late 2016, Mr. Goodman, as the sole employee, stockholder and officer in a related company known as Multi-Media System Design, Inc., pushed the “CrowdSource The Truth” media brand. This brand has had its social media accounts terminated on dozens of occasions. Within the past 45 days Mr. Goodman has had three Twitter (3) accounts terminated and two (2) YouTube accounts terminated for violations of Community Standards. Goodman blames the Sweigert brothers for these occurrences.

2. Mr. Goodman files foundationless lawsuits, like this instant action, to raise awareness of his podcasts via the audience draw of “new criminal investigations”. The docketing of these lawsuits is designed to prop up Mr. Goodman’s dwindling social media audience. Mr. Goodman continues to seek financial donations to fight against all the people engaged in “social engineering” and “lawfare” against him (to include the Sweigert Brothers aka *Stupid Mario Brothers*).

3. This instant action is a sham lawsuit which is cited by Goodman on his podcasts to bolster sham court filings (Goodman Amicus). Mr. Goodman is essentially using the U.S. Court System as a backdrop for staged litigation which he reports on to provide content to his paid followers on pay-per-view services.

4. Mr. Jason Goodman operates a social media “counter-lawfare” web-site that solicits donations and financial contributions from the public to support the lawsuits that Goodman files. Goodman has publicly claimed that he is “A LEGAL ADVOCATE”. Mr. Goodman’s web-site “CrowdSourceTheTruth.ORG” displays the very complaint (ECF no. 1) on the “splash” page of the “COUNTERLAWFARE” web-site. The “COUNTERLAWFARE” web-site is built around this instant legal action (see below) and provides opportunities to donate up to \$1,000.00 with a mouse click (also contained as **EXHIBIT A** in accompanying volume of EXHIBITS).

Goodman v Bouzy et al

Chris Bouzy and Bot Sentinel are being sued. Read the complaint here

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IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

JASON GOODMAN

Plaintiff,

vs.

CHRISTOPHER ELLIS BOUZY, BOT SENTINEL, INC.
GEORGE WEBB SWEIGERT

Defendants

Case No.:

**COMPLAINT FOR CONSPIRACY TO
DEFAME**

JURY TRIAL DEMANDED

Pro Se Jason Goodman ("Goodman") alleges as follows, upon actual knowledge with respect to himself and his own acts, and upon information and belief as to all other matters.

AND WHEREFORE AND WHEREBY DEMANDS WITH THE SOLE AID OF DAMAGING FRUITS:

4. Defendants conspired to damage Plaintiff's business and reputation and to publish false accusations of heinous crimes that rise to the level of defamation per se.

PARTIES

5. Plaintiff Pro se Plaintiff Jason Goodman is a New York citizen, CEO of Multimedia System Design, Inc ("MSD"). Goodman is a documentary filmmaker, a journalist and is the creator of the social media property Crowdsourcethe Truth.

COMPLAINT FOR ABUSE OF PROCESS AND MISCONDUCT BY ATTORNEYS - 1

1/11 Next ►

COUNTERLAWFARE FUND

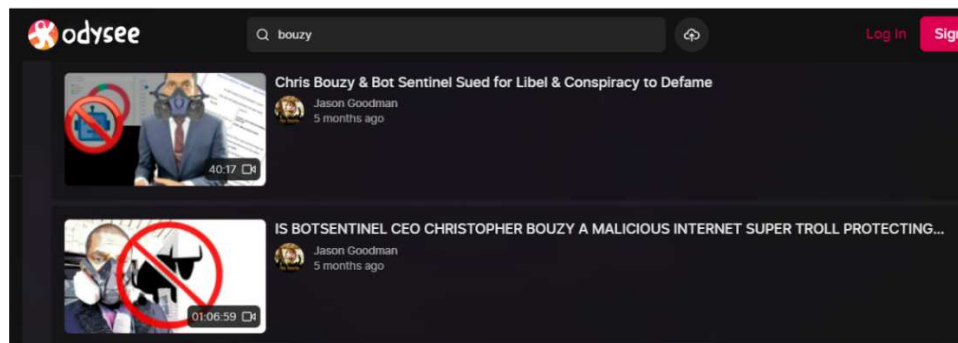
<https://crowdsourcethetruth.org/>

5. The Plaintiff works within a social media confederation that promotes his COUNTERLAWFARE efforts, requests for donations, etc. This group helps sensationalize and amplify social media “soap operas” created by Mr. Goodman that are promoted amongst the group to solicit funds from the public. This instant action against Defendant G.W. Sweigert by Mr. Goodman is nothing more than a made for social media “soap opera” drama used to raise monies for the players involved.

6. The Plaintiff publicly affiliates himself with media stars of the Russia-controlled media service SPUTNIK, such as a felon and fugitive from U.S. justice John Mark Dugan who currently reports to Mr. Goodman’s social media channel while embedded within Russian military forces fighting in the Ukraine. Numerous interviews on SPUTNIK’s BACKSTORY program include Plaintiff’s appearances with lifelong friend of Plaintiff Lee Stranahan, who is a lifelong friend of former Trump Media Campaign manager Brad Parscale, who in-turn is a life long friend of the Plaintiff.

7. To contextualize this confederation: Defendant George Webb Sweigert was a room-mate with Jason Goodman for four (4) months, Jason introduced George to Lee Stranahan, who George paid \$5,000.00 to facilitate a meeting with Parscale, and George introduced Charles Ortel to Jason Goodman. All classify themselves as social media citizen journalists. Their “investigative journalism” typically orbits pro-Russian propaganda about Ukraine and promotion of others in the group. The end game is to use the courts as a back drop for staged broadcasts.

8. To illustrate this social media behavior for the Court, consider that this instant action was docketed with the Clerk of the Court (December 2021) Mr. Goodman created simultaneous fanfare with LiveStream broadcasts from the S.D.N.Y. courthouse steps the same day of docketing, see below:



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Chris Bouzy & Bot Sentinel Sued for Libel & Conspiracy to Defame

December 22nd, 2021 • 68 views

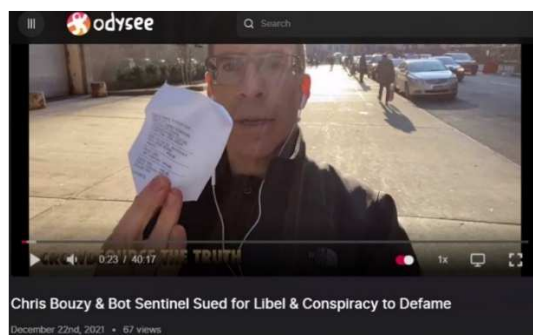
IS BOTSENTINEL CEO CHRISTOPHER BOUZY A MALICIOUS INTERNET SUPER TROLL PROTECTING BEN WITTES?

December 17th, 2021 • 373 views

Chris Bouzy is a malicious troll and there is good reason to believe Bot Sentinel may be a criminal organization. He must be investigated.

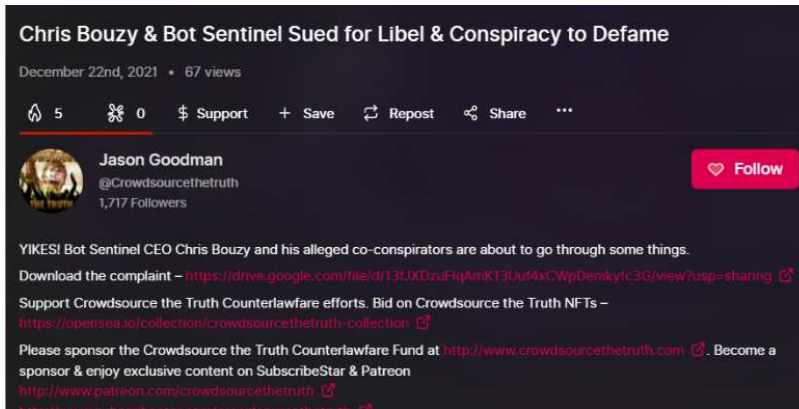
[https://odysee.com/\\$/search?q=bouzy](https://odysee.com/$/search?q=bouzy)

9. Video number one:

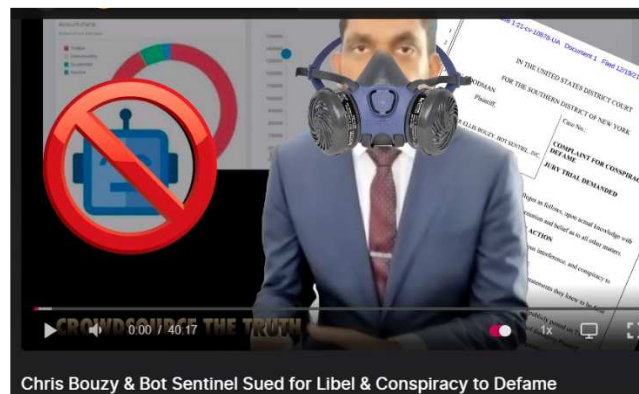


Plaintiff displays receipt from Clerk of the Court for this instant action.

<https://odysee.com/@Crowdsourcethetruth:d/bouzysued:3>



<https://odysee.com/@Crowdsourcethetruth:d/bouzysued:3>



<https://odysee.com/@Crowdsourcethetruth:d/bouzysued:3>

10. Video number two:

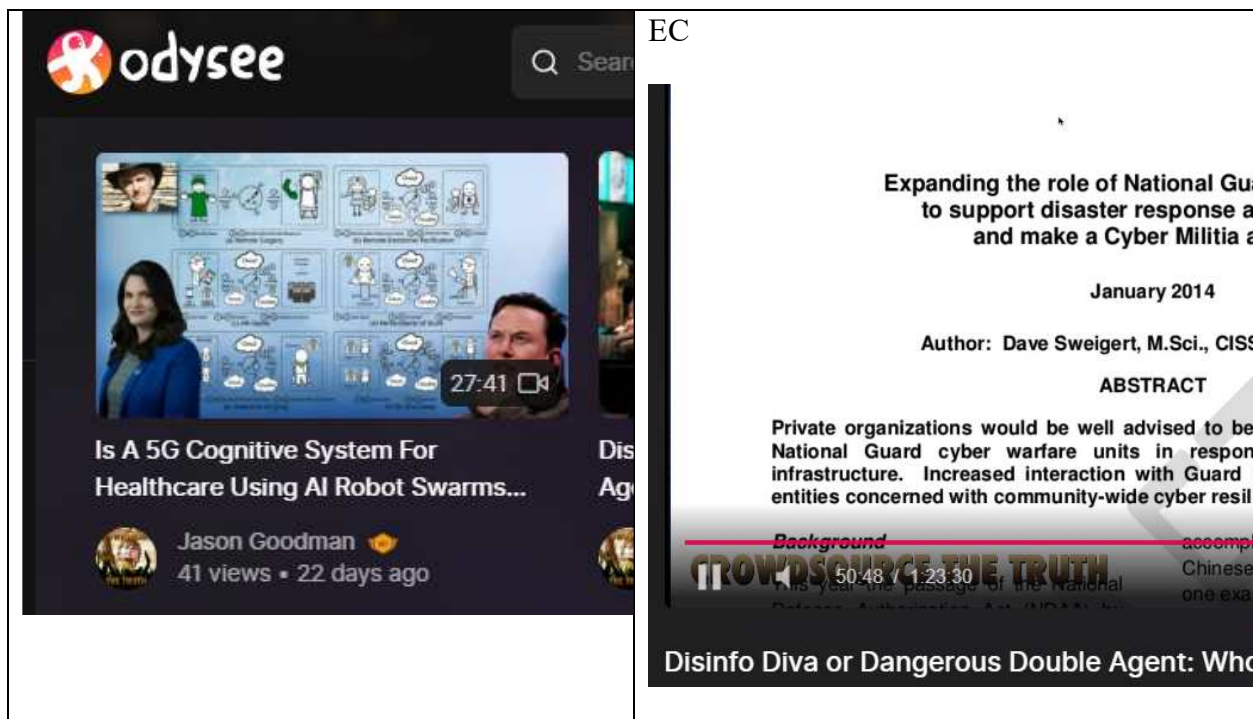


<https://odysee.com/@Crowdsourcethetruth:d/BOUZYBOTSENTINEL:a>



<https://odysee.com/@Crowdsourcethetruth:d/BOUZYBOTSENTINEL:a>

11. Concerning the proposed intervenor, as recently as May 19, 2022 Mr. Goodman featured a video series on Nina Jankowicz, former Executive Director of the Disinformation Governance board of the U.S. Department of Homeland Security, which featured the unrelated professional papers of the proposed intervenor with innuendos that the proposed-intervenor may be working with affiliates of the notorious Neo-NAZI Azov Battalion.



ECF doc. 32, attached as **EXHIBIT B** in the accompanying volume of **EXHIBITS**

Is Nina Jancowicz merely a frustrated Broadway showtunes songstress or is she a dangerous subversive operative working to undermine the U.S. government from within? In this report, Jason Goodman of Crowdsourcethe Truth reveals unimpeachable evidence indicating Nina may actually work for the Zelenskyy government, has received numerous payments to a shadowy LLC from non-U.S. NGOs and has failed to register under the foreign agent registration act. Hear Nina herself, and her colleagues at The Brookings Institution, The Wilson Center and others as Goodman teases out admissions that almost certainly lead to the immediate dissolution of the Orwellian Disinformation Governance Board. Produced by CrowdSourceTheTruth.com

<https://odysee.com/@Crowdsourcethetruth:d/2022-05-16-20-00-03-Live:9>

12. Mr. Goodman has reassured tens of thousands of his podcast viewers that the “*Stupid Mario Brothers*” (proposed intervenor D.G. Sweigert and Defendant George Webb Sweigert) are working with treasonous operatives within the government and should be jailed.



Jason Goodman @JGoodman_CSTT · 2h

George Webb & his reprehensible brother are actively working to get @OdyseeTeam removed from the internet. These subversive operators are un-American enemies of free speech & should be jailed. Watch the Counterlawfare Report subscribestar.com/crowdsourcethe... patreon.com/crowdsourcethe...

You reported this Tweet.

View

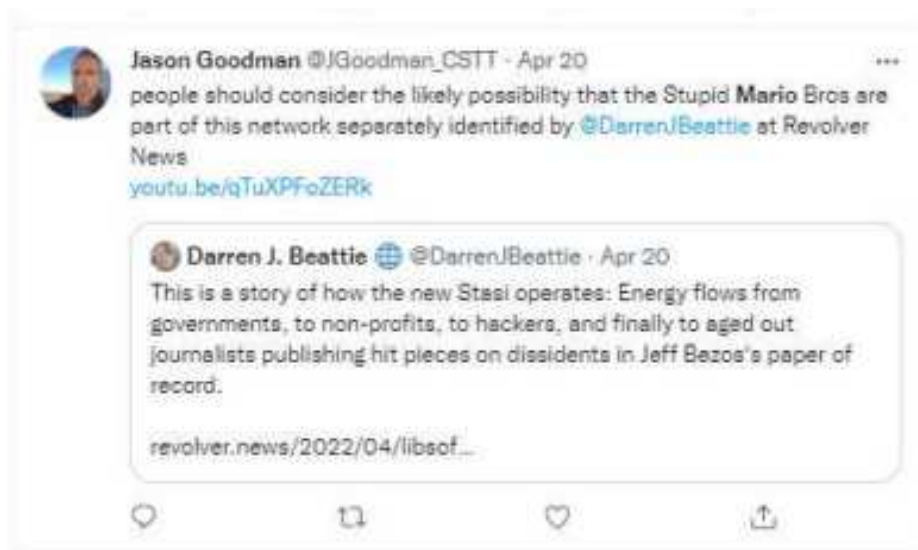


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https://twitter.com/JGoodman_CSTT/status/1504954872273285126



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13. The heart of the *Goodman Amicus* speaks to the *Stupid Mario Brothers* being inextricably intertwined (as demonstrated by the foregoing displayed tweets).

18. On or around December 17, 2021, coincident with a filing by Webb in *Sweigert v CNN* (See Case 2:20-cv-12933-GAD-KGA ECF No. 35) Bouzy republished his 2020 defamatory statements intended to injure Plaintiff.

19. Plaintiff has submitted an Amicus Curiae brief in *Sweigert v CNN* that alleges criminal activity on the part of Webb and others. (See Case 2:20-cv-12933-GAD-KGA ECF No. 20)

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14. The *Goodman Amicus* is the cornerstone to this instant action. The Amicus brief (accompanies this pleading as **EXHIBIT C** in separate volume) alleged a conspiracy between the proposed intervenor D.G. Sweigert and the Defendant George Webb Sweigert to entrap a Court employee, Richard Loury, in a scheme to file a document that constitutes “fraud upon the court”. See below.

On information and belief, Goodman alleges that Sweigert and Webb, in an effort to improperly involve Goodman in *Sweigert v CNN*, have conspired with or otherwise deceived a third individual, an employee of the court, Richard Loury (“Loury”), to commit a fraud on the court. Document properties of ECF No. 12 reveal that Loury is named as the author of pro se Plaintiff Webb’s pleading. (**EXHIBIT A**). These properties are visible in the free reader Adobe Acrobat DC or the commercial application Adobe Acrobat Professional.

Case 2:20-cv-12933-GAD-KGA ECF No. 20, PageID.244 Filed 07/20/21 Page 2 of 4

*Included as **EXHIBIT C** in accompanying VOLUME OF EXHIBITS*

15. As noted above, Mr. Goodman believes that the *Stupid Mario Brothers* conspired to file the action *George Webb Sweigert v. the Cable News Network* in the Eastern District of Michigan. This confirms the inextricability intertwined *Stupid Mario Brothers*, as noted in Mr. Goodman's amended Amicus with an Amended version, quoted in relevant part below:

plaintiff, his brother, and their various associates. Goodman comes now as a friend of the court to share empirical evidence from the Court's own docket that is likely to prove the plaintiff and others conspired with at least one officer of the Court to make material misrepresentations and directly attack the judicial machinery with malicious intent so significant as to prevent the Court's performance of judicial tasks without bias or prejudice. Plaintiff and his co-conspirators acted in violation of Michigan penal code section 750.248(1) which states "A person who falsely makes, alters, forges, or counterfeits a public record, or a certificate, return, or attestation of a clerk of a court[,] or other property with intent to injure or defraud another person is guilty of a felony punishable by imprisonment for not more than 14 years." This illicit conspiracy made

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*Included as **EXHIBIT D** in accompanying VOLUME OF EXHIBIT*

16. All of Mr. Goodman's Amicus documents were stricken from the record by District Judge Gershwin A. Drain by ORDER of March 21, 2022 (included as **EXHIBIT E** in the accompanying volume of **EXHIBITS**).

17. Judge Drain concluded the Amicus with filled with conclusory statements.

practice. Moreover, Mr. Goodman has not served either party with his filings. To the extent Mr. Goodman's and Mr. Sweigert's proposed amici briefs are relevant to the present matter's disposition, the Court disagrees. Mr. Goodman's filings contain conclusory allegations of Plaintiff conspiring with a court employee "to commit fraud on the court." ECF No. 20, PageID.244; ECF No. 55, PageID.600. D. G. Sweigert's proposed amicus brief attempts to "provide an accurate and truthful opposition" to Mr. Goodman's recent filing. ECF No. 56, PageID.619.

Included as Exhibit E in accompanying volume

18. Mr. Goodman used his social media clout to announce the filing of his Amicus Brief and the resulting criminal allegations. Mr. Goodman's social media heralding of the Amicus Brief was documented a week later by the proposed intervenor D.G. Sweigert (ECF no. 22). As shown below Mr. Goodman filed the Amicus Brief on 7/20/2021, which was countered by the undersigned on 7/27/2021.

07/20/2021	20	[STRICKEN] AMICUS CURIAE BRIEF by Jason Goodman (DPer) Modified on 3/21/2022 (TMcg). (Entered: 07/20/2021)
07/21/2021	21	RESPONSE to 15 Motion to dismiss filed by George Webb Sweigert. (DPer) (Entered: 07/21/2021)
07/27/2021	22	DECLARATION by D.G. Sweigert filed by D.G. Sweigert. (JOwe) (Entered: 07/27/2021)

07/20/2021	20	[STRICKEN] AMICUS CURIAE BRIEF by Jason Goodman (DPer) Modified on 3/21/2022 (TMcg). (Entered: 07/20/2021)
07/27/2021	22	DECLARATION by D.G. Sweigert filed by D.G. Sweigert. (JOwe) (Entered: 07/27/2021)



<https://www.youtube.com/watch?v=MVzocok1fy8>

Crowdsourcethe Truth 5
8.95K subscribers
SUBSCRIBE
The Counter Lawfare Report returns to Crowdsourcethe Truth with a new legal expert. Harvard JD, tech entrepreneur and legal expert Jonathan Snyder joins me to explore allegations of corruption within the Federal Court system. This is going to be an explosive episode. Join us on SubscribeStar and Patreon.

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Case 2:20-cv-12933-GAD-KGA ECF No. 22, PageID.257 Filed 07/27/21 Page 5 of 9

Attached as Exhibit F in accompanying volume

19. Mr. Goodman then filed an Amended Amicus Brief in the Eastern District of Michigan in a very public manner (see below).

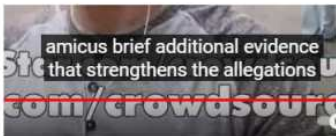




An amended Amicus Curiae Brief has dropped like a MOAB on the docket in Detroit sending shockwaves through Stupid Mario World. The weather is warming up as some people face the real possibility of jail.

<https://www.youtube.com/watch?v=hrPfebLivPI>

An amended Amicus Curiae Brief has dropped like a MOAB on the docket in Detroit sending shockwaves through Stupid Mario World. The weather is warming up as some people face the real possibility of jail.

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 <p>Case 2:20-cv-12933-GAD-KGA ECF No. 56, PageID.630 Filed 03/16/22 Page 13 of 17</p>	 <p>Case 2:20-cv-12933-GAD-KGA ECF No. 56, PageID.633 Filed 03/16/22 Page 16 of 17</p>	 <p>Case 2:20-cv-12933-GAD-KGA ECF No. 56, PageID.633 Filed 03/16/22 Page 17 of 17</p>
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20. Mr. Goodman's Amended Amicus Brief.

rest of his life for no stated reason. On information and belief, Goodman alleges the Sweigert Brothers conceived of Webb v CNN for the inappropriate purpose of involving Goodman strictly to harass him and extort money. Goodman further alleges the Sweigert Brothers conspired with Loury and Weaver to improperly draft and file pleadings on behalf of Webb and to abuse and deceive the Court in an illicit effort to turn it into their own personal weapon against Goodman.

Case 2:20-cv-12933-GAD-KGA ECF No. 55, PageID.605 Filed 03/14/22 Page 6 of 10

CONCLUSION

For the reasons stated in Defendant's motion to dismiss and further for the foregoing reasons, Defendant's motion to dismiss should be granted. Additionally, Amicus Curiae Goodman prays the court will further investigate this matter relating to a conspiracy to defraud the Court in violation of the Michigan Penal Code Section 750.248(1) and issue whatever remedy it deems most appropriate.

Case 2:20-cv-12933-GAD-KGA ECF No. 55, PageID.609 Filed 03/14/22 Page 10 of 10

21. Mr. Goodman describes this brotherly relationship in his pleading, see below.

Defendant Webb and his brother, non-party David have been at the epicenter of a conspiracy to defame and harass plaintiff Goodman for more than five years. The Sweigert brothers along with defendant Bouzy and others, conspire to spread defamatory claims with the deliberate intent to damage Goodman's public reputation and destroy his business. The trio have conspired to incite public hatred against Goodman by falsely accusing him of criminal acts. They have presented no legitimate evidence, only their own fabricated statements. The conspiracy has operated continuously, in an ongoing manner for the past five years, up to and including today. Defendants have coordinated in person

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22. By Plaintiff's statements cited above, proposed intervenor D.G. Sweigert would have collaborated or known about the garden variety defamation allegation citing a May 2018 remark made by Defendant George Webb Sweigert. Mr. Goodman states that he believes the proposed intervenor D.G. Sweigert has been in a conspiracy with his brother GEORGE WEBB.

14. On or around May 2018, Webb published a video on YouTube that has since been deleted. In the video, Webb made the false allegation that the Plaintiff had raped then underage Somali fashion model Halima Aden ("Aden") (https://en.wikipedia.org/wiki/Halima_Aden).

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23. The Hon. Gershwin Drain addresses this situation in his case transfer order for see *George Webb Sweigert v. Jason Goodman*, 1:22-cv-02788-LGS, see below:

II. BACKGROUND

All the alleged misconduct in the present case occurred while Plaintiff lived in Georgia, and Defendant resided in New York City, where the Southern District of New York sits. In July 2021, Defendant submitted a procedurally improper amicus brief in another case before this Court, alleging Plaintiff committed fraud. *See Sweigert v. CNN, Inc.*, No. 20-cv-12933, 2022 U.S. Dist. LEXIS 50529, at *21 (E.D. Mich. Mar. 21, 2022). A month prior, Defendant began contacting Court personnel complaining about how *pro se* documents are filed on the Court's electronic case management system. ECF No. 12, PageID.127. Defendant began contacting Court personnel after work hours, engaging in a pattern of abusive phone calls. *Id.* The Court held a show cause hearing on March 4, 2022, requesting Defendant explain why he should not be sanctioned for his behavior. *Id.* at PageID.126. After

LAW AND ARGUMENT

Intervention permits an interested non-party, with leave of the court, to voluntarily join a lawsuit already in progress so that the non-party's interest be defended. Generally, the court accepts as true the applicant's well-pleaded, non-conclusory allegations and supporting material. *See Bay Casino, LLC v. M/V Royal Empress*, 199 F.R.D. 464, 466 (E.D.N.Y. 1999).

Intervention is timely as the case is presently in its infancy, awaiting service of process confirmation. (1) "[w]hether intervention be claimed of right or as permissive, it is at once apparent, from the initial words of both Rule 24(a) and Rule 24(b), that the application must be 'timely,' " *NAACP v. New York*, 413 U.S. 345, 365, 93 S.Ct. 2591, 37 L.Ed.2d 648 (1973).

Proposed intervenor wants to protect his professional technical reputation and has a “direct, substantial, and legally protectable.” *Bridgeport Guardians v. Delmonte*, 602 F.3d 469, 473 (2d Cir. 2010) (citation and internal quotation marks omitted).

Plaintiff has published hundreds of social media podcasts and tweets that label the proposed intervenor as working for a conspiratorial deep state, working in criminal conspiracies with his brother, George Webb Sweigert. Mr. Goodman uses his sham court filings and sham lawsuits (as in this instead action) to advance a reputation destruction campaign against the proposed intervenors’ protectable right to a good trade reputation.

In discussing "interest" in the context of intervention, the Supreme Court has stated that the interest must be "significantly protectable." See *Donaldson v. United States*, 400 U.S. 517, 531, 91 S.Ct. 534, 542, 27 L.Ed.2d 580 (1971); see also *Cascade Natural Gas Corp. v. El Paso Natural Gas Co.*, 386 U.S. 129, 154, 87 S.Ct. 932, 946, 17 L.Ed.2d 814 (1967) (Stewart, J., dissenting) (applicant must "have an 'interest' in the litigation sufficiently direct and immediate to justify his entry as a matter of right").

The Movant is “uniquely situated” to provide information to this Court for the purposes of untangling the jumble of claims and cross-claims. Turning to the wisdom of the Western District of Michigan in *United States v. ABC Industries*, 153 F.R.D. 603 (W.D. Mich. 1993) which relied upon *Utah State Dep't of Health v. Kennecott Corp.*, 801 F.Supp. 553, 572 (D.Utah 1992) (denying "intervention of right" but granting "permissive intervention" to a party "uniquely situated to significantly contribute to the underlying factual and legal issues") and *United States v. Acton Corp.*, 131 F.R.D. 431 (D.N.J. 1990) (allowing intervention under Rule 24(a)(2) and CERCLA Section 113(i))

CONCLUSION

Goodman's sham and hoax litigation used to bolster fabricated criminal investigation is the height of bad faith. Mr. Goodman cares only for new paid subscribers to his pay-per-view platforms and COUNTERLAWFARE donations. There are no cognizable injuries that are well pled in the sham Initial Complaint (ECF no. 1).

When the social media ratings of Goodman's podcasts were sinking in July 2021, Mr. Goodman created the *Goodman Amicus* hoax and sham document (accompanied by podcasts featuring S.D.N.Y. practicing attorney John Hoover Snyder (Harvard, J.D.). When that gambit didn't work, Goodman sued GEORGE WEBB in December 2021 in another hoax and scam lawsuit related to Christopher E. Bouzy. These activities were undertaken in bad faith.

Having no real legitimate claims against that Sweigert Brothers, all that is left is Mr. Goodman's railings and rantings about baseless "criminal investigations" for his profit-driven social media podcasts.

I hereby attest that the foregoing was signed and transmitted on June 14, 2022 (6/14/2022) under the penalties of perjury.



**PROPOSED INTERVENOR
D. G. SWEIGERT, C/O
MAILBOX, PMB 13339
514 Americas Way,
Box Elder, SD 57719**